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June 17, 1981

Jay P. Roth, Esquire
617 South Olive Street
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Dear Mr. Roth:

In reply to your letter of June 10, 1981, we are proposing to resolve the following existing law suits:

1. Burden
2. Hartwell
3. Cooper v. Church of Scientology of Boston in the Federal District Court of Boston
4. Troy
5. Hansen
6. Van Schaick/S. Garritano
7. Graves, L. Garritano, S. Garritano, Gervais
8. Stifler
9. Donald Bear, Peggy Bear (about to be filed in New York)
10. Seubert (recently filed in Washington)
11. Varchaland Smith
12. Schwartz (about to be filed in Washington)
13. Peterson, Garrity, Lockwood, Jefferson (about to be filed in Los Angeles)
14. Carringer, Littler, Novotney, LeCornu, McGahey (about to be filed in Los Angeles)

We are not proposing to resolve any other Florida cases, or any other cases in the hands of lawyers not associated with us.

We are proposing to withdraw completely from all future Scientology litigation which includes all assistance of any nature to other lawyers, interest groups, etc.

If the Church is interested in our proposal, I would suggest that it move quickly because we are in the process right now of associating with 5 additional lawyers in various cities in connection with 20 additional law suits. We have currently

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developed new associations with lawyers in Washington, New York, Los Angeles and Denver.

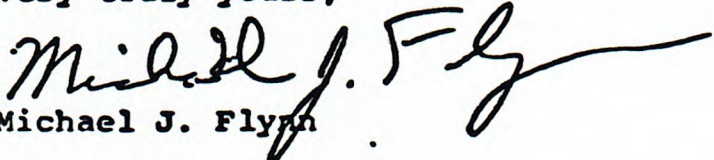
Without the collection of documents, materials, witnesses and knowledge which we have amassed throughout the United States, these lawyers would, as a practical matter, be unable to proceed. Over the next 30 days we expect to solidify our positions with these lawyers and double our efforts to initiate law suits on behalf of our numerous clients.

We are at the crossroads of increasing the litigation or withdrawing completely from it.

If we are unable to effectuate a settlement, we will be left with the sole option of increasing the litigation as rapidly and in as great a number as possible. We will continue these efforts while the Church is deliberating about our proposal.

I will expect to hear from you as soon as possible.

Very truly yours,


Michael J. Flynn

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